

**MEMO ENDORSED**

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December 21, 2021

By ECF

Hon. Valerie E. Caproni  
United States District Court Judge  
Southern District of New York  
40 Foley Square  
New York, New York 10007

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Re: United States v. Avila, et al. (Tyler Patterson)  
Ind. #: (S3) 19 Cr. 166 (VEC)

Dear Judge Caproni:

I write to respectfully request a 45 day extension of the date for the filing of the defense sentence submission in this matter (currently due December 23), and a corresponding adjournment of the sentencing to a date to March, 2022. Through contacts with several family members of my client, I have recently become aware of documents residing with the Administration for Children's Services ("ACS") which I anticipate will be central to my client's sentencing case, and which it is important for the Court to be aware of when imposing sentence. I am currently working with my client's mother and others who are assisting me to obtain these records, and request that the Court provide me with the time needed to prepare a full and complete sentencing presentation in this serious matter. I have written the prosecutors seeking their position with respect to this application, but have not yet received a response.

Thank you very much for your attention. If your Honor desires further information with respect to this application, it is requested that the undersigned be contacted.

Respectfully,

*Robert A. Soloway*

Robert A. Soloway

cc: All Counsel (by ECF)  
RAS:sc

Application GRANTED. The sentencing hearing currently scheduled for Tuesday, January 18, 2022, at 11:00 a.m. is hereby ADJOURNED until **Monday, March 7, 2022, at 11:00 a.m.** The deadline to submit sentencing submissions is hereby ADJOURNED from December 23, 2021 until February 21, 2022.

SO ORDERED.

 12/21/21

HON. VALERIE CAPRONI  
UNITED STATES DISTRICT JUDGE